

# EXHIBIT 1

KAZEROUNI LAW GROUP, APC  
6069 South Fort Apache Road, Suite 100  
Las Vegas, Nevada 89148

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

---

Abbas Kazerounian, Esq.  
*Pro Hac Vice*  
 Michael Kind, Esq.  
 Nevada Bar No. 13903  
**KAZEROUNI LAW GROUP, APC**  
 6069 S. Fort Apache Rd., Ste. 100  
 Las Vegas, NV 89148  
 Phone: (800) 400-6808  
 ak@kazlg.com  
 mkind@kazlg.com

David H. Krieger, Esq.  
 Nevada Bar No. 9086  
**HAINES & KRIEGER, LLC**  
 8985 S. Eastern Ave., Ste. 350  
 Henderson, NV 89123  
 Phone: (702) 880-5554  
 dkrieger@hainesandkrieger.com  
*Class Counsel*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

<p>Joseph J. Smith, <i>individually and on behalf of all others similarly situated</i>,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p style="text-align: center;">One Nevada Credit Union,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No.: 2:16-cv-02156-GMN-NJK</p> <p><b>Supplemental Brief in support of Motion for Final Approval of Class Action Settlement [ECF No. 60]</b></p> <p>Hearing: March 5, 2019          Time: 11:00 am          Courtroom: 7D</p> <p>Chief Judge Gloria M. Navarro</p>
---	---

Plaintiff Joseph J. Smith's ("Plaintiff") motion for final approval of class action settlement was filed on February 5, 2019. ECF No. 60.

At the time the motion was filed, Kurtzman Carson Consultants, LLC ("KCC" or "Claims Administrator") had received 12,764 timely claim forms (8,887

1 by mail and 3,877 online). Hack Dec., ECF No. 60-5, ¶ 12.

2 Since that time, KCC received an additional 201 timely claim forms. Hack  
3 Suppl. Dec., ¶¶ 2-3. Another 52 claim forms were received but were untimely. *Id.*

4 In total, 13,017 timely claim forms (9,140 by mail and 3,877 online) have  
5 been received. *Id.* No additional requests for exclusion and no objections have been  
6 received.

7 As a result, should this Court grant the pending motions, each claimant will  
8 receive approximately \$20.74, instead of the \$21.15 cited in the motion. The claims  
9 rate is now approximately 14.90% instead of about 14.61% discussed in the motion.  
10 The high claims rate, lack of objections, and few requests for exclusion supports  
11 that the Class was given sufficient notice and understood and approved the  
12 Settlement as fair, reasonable, and adequate.

13 DATED this 4th day of March 2019.

14  
15 **Kazerouni Law Group, APC**

16 By: /s/ Michael Kind  
17 Michael Kind, Esq.  
18 6069 S. Fort Apache Rd., Ste. 100  
19 Las Vegas, NV 89148  
20 *Class Counsel*  
21  
22  
23  
24  
25  
26  
27  
28

KAZEROUNI LAW GROUP, APC  
6069 S. Fort Apache Rd., Ste. 100  
Las Vegas, NV 89148

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

JOSEPH J. SMITH, an individual, on  
behalf of himself and all others similarly  
situated,

Plaintiff,

v.

ONE NEVADA CREDIT UNION,

Defendant.

Case No.: 2:16-cv-02156-GMN-NJK

**SUPPLEMENTAL DECLARATION  
OF H. JACOB HACK ON BEHALF  
OF SETTLEMENT  
ADMINISTRATOR REGARDING  
NOTICE**

**SUPPLEMENTAL DECLARATION OF H. JACOB HACK ON BEHALF OF  
SETTLEMENT ADMINISTRATOR REGARDING NOTICE**

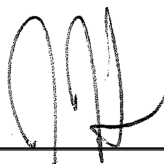
I, H. Jacob Hack, declare:

1. I am employed as a project manager by Kurtzman Carson Consultants (“KCC”), a nationally-recognized notice and claims administration firm located at 462 South 4th Street, Louisville, KY 40202. KCC was retained as the Settlement Administrator in this case, and as the project manager, I oversee all aspects of the administrative services provided. I submit this supplemental declaration regarding the *Smith v. One Nevada Credit Union*, Notice Program.

2. Since my previous declaration, dated February 5, 2019, KCC has received 253 additional paper claims. Of the 253 paper claims, 201 were timely claims and 52 were late claims.

3. The deadline to submit a Claim Form was January 24, 2019. To date, KCC has received 13,017 timely claims. Of those, 3,877 claims were submitted online and 9,140 claims were submitted via postal mail.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and that this declaration was executed this 4<sup>th</sup> of March, 2019, at Louisville, Kentucky.

---

H. Jacob Hack